

DOUGLAS R. DAVIS
KEESAL, YOUNG & LOGAN
1029 West Third Avenue, Suite 650
Anchorage, Alaska 99501-1954
doug.davis@kyl.com
Telephone: (907) 279-9696
Facsimile: (907) 279-4239

Attorneys for Crowley Marine Services, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

GARY J. CROCHET,

Plaintiff,

vs.

CROWLEY MARINE SERVICES, INC.

Defendant.

Case No. 3:05-cv-0288-TMB

**MEMORANDUM REGARDING
PRETRIAL DEADLINES**

In accordance with the Court's order of August 31, 2006, defendant Crowley Marine Services, Inc. proposes that the remaining pretrial deadlines established by the Court in its prior order be postponed six months so that plaintiff's condition post-surgery has stabilized sufficiently so that he can be further evaluated. A copy of the medical record regarding that surgery is attached as Exhibit A. Counsel for defendant has also spoken to Dr. Dean Ricketts, an orthopedic specialist retained by defendant, to ask Dr. Ricketts about the normal recovery process from surgeries of this type. As stated in counsel's

1 declaration, Dr. Ricketts has reviewed plaintiff's medical records, including his
2 surgery report of June 28, 2006. According to Dr. Ricketts, who is experienced
3 with this type of surgical procedure, patients are not sufficiently stabilized in
4 order to have their physical condition assessed until three to six months following
5 such a surgery.

6 Postponing the present pretrial deadlines for an additional six
7 months will ensure that plaintiff is sufficiently stable to allow the parties and
8 their retained experts sufficient time to evaluate plaintiff's condition and its
9 impact on various issues in this lawsuit. Extending the deadlines in this fashion
10 will increase reliability of the evidence presented to the Court and will facilitate
11 an orderly trial of this case.

12 DATED at Anchorage, Alaska this 8th day of September, 2006.

13
14 KEESAL, YOUNG & LOGAN
Attorneys for Crowley Marine Services, Inc.

15
16 s/DOUGLAS R. DAVIS
1029 W. Third Avenue, Suite 650
17 Anchorage, AK 99501
(907) 279-9696
18 (907) 279-4239 facsimile
doug.davis@kyl.com
19 Alaska Bar No. 7605022
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE:

I HEREBY CERTIFY THAT I CAUSED TO
BE SERVED A TRUE AND CORRECT COPY
OF THE FOREGOING THIS 8TH DAY OF
SEPTEMBER, 2006 TO:

Via Email

Heather L. Gardner
Michael Patterson
Law Office of Michael J. Patterson
810 W. 2nd Avenue
Anchorage, AK 99501

s/ DOUGLAS R. DAVIS